

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TBI DIAGNOSTIC CENTERS OF
GEORGIA, LLC

Plaintiff,

VS.

STATE FARM MUTUAL
AUTOMOBILE INSURANCE
COMPANY and STATE FARM FIRE
AND CASUALTY COMPANY,

Defendants.

CASE NO. _____

CASE BELOW:

Superior Court of DeKalb County,
Georgia, Case No. 23CV6931

JURY DEMAND

DEFENDANTS' CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT

COME NOW STATE FARM MUTUAL AUTOMOBILE INSURANCE and
STATE FARM FIRE AND CASUALTY COMPANY, Defendants in the above-
styled action, by and through their undersigned counsel and pursuant to Federal Rule
of Civil Procedure 7.1 and Local Rule 3.3, file this Certificate of Interested Persons
and Corporate Disclosure Statement, showing this Honorable Court as follows:

(1) The undersigned counsel of record for a party or proposed intervenor in this action certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor:

a. TBI Diagnostic Centers of Georgia, LLC (Plaintiff)

b. State Farm Mutual Automobile Insurance Company (Defendant)

c. State Farm Fire and Casualty Company (Defendant)

(2) The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this case:

None.

(3) The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this case:

For Plaintiff:

**Douglas H. Dean
LAWSON, REID & DEAN LLC
601 East 14th Avenue (31015)
P.O. Box 5005
Cordele, Georgia 31010
(229) 271-9323
Douglas.dean@lawsonreidlaw.com**

For Defendants:

**Jonathan M. Adelman
WALDON ADELMAN CASTILLA
HIESTAND & PROUD
900 Circle 75 Parkway
Suite 1040
Atlanta, Georgia 30339**

(770) 953-1710

jademan@wachp.com

Joseph A. Cancila, Jr. (*pro hac application to be submitted*)

Nick Kahlon (*pro hac application to be submitted*)

Maegan McAdam (*pro hac application to be submitted*)

RILEY SAFER HOLMES & CANCILA LLP

70 West Madison Street, Suite 2900

Chicago, Illinois 60602

(312) 471-8700

jcancila@rshc-law.com

nkahlon@rshc-law.com

mmcadam@rshc-law.com

(4) The undersigned further certifies that the following is a full and complete list of the citizenship of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed:

Plaintiff: Plaintiff is a Georgia citizen. Plaintiff is a Georgia limited liability company with places of business solely in Georgia. Gairy Johnson is the only listed organizer/member of Plaintiff. Gairy Johnson is a resident and citizen of the State of Georgia, which means Plaintiff is a Georgia citizen.

Defendant: Defendant State Farm Mutual Automobile Insurance is a mutual insurance company and is a citizen of Illinois. Defendant State Farm Fire and Casualty Company is a stock insurance company and is a citizen of Illinois.

This 1st day of September, 2023.

WALDON ADELMAN CASTILLA
HIESTAND & PROUT

/s/ Jonathan M. Adelman

Jonathan M. Adelman
(State Bar No. 005128)
Attorney for Defendants

900 Circle 75 Parkway
Suite 1040
Atlanta, Georgia 30339
(770) 953-1710
jadelman@wachp.com

CERTIFICATE OF COMPLIANCE

This certifies that the foregoing brief is typed in 14-Point, Times New Roman font and is otherwise formatted in compliance with LR 5.1.

This 1st day of September, 2023.

WALDON ADELMAN CASTILLA
HIESTAND & PROUT

/s/ Jonathan M. Adelman
Jonathan M. Adelman
(State Bar No. 005128)
Attorney for Defendants

900 Circle 75 Parkway
Suite 1040
Atlanta, Georgia 30339
(770) 953-1710
jadelman@wachp.com

CERTIFICATE OF SERVICE

I hereby certify that, on this the 1st day of September, 2023, I electronically filed the foregoing *Certificate of Interested Persons and Corporate Disclosure Statement* with the Clerk of this Court using the CM/ECF system which will automatically provide notice of such filing via electronic mail to the following attorney(s) of record:

Douglas Dean
LAWSON, REID & DEAN, LLC
601 East 14th Avenue (31015)
P.O. Box 5005
Cordele, Georgia 31010
Douglas.Dean@lawsonreidlaw.com
Attorney for Plaintiff

This 1st day of September, 2023.

WALDON ADELMAN CASTILLA
HIESTAND & PROUT

/s/ Jonathan M. Adelman
Jonathan M. Adelman
(State Bar No. 005128)
Attorney for Defendants

900 Circle 75 Parkway
Suite 1040
Atlanta, Georgia 30339
(770) 953-1710
jadelman@wachp.com